

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

**Honorable Robert B. Kugler,
District Judge**

This Documents Relates to All Actions

**ZHP DEFENDANTS' NOTICE OF OBJECTIONS TO
AND MOTION TO REVERSE SPECIAL MASTER ORDER NO. 84**

PLEASE TAKE NOTICE that on October 16, 2023, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC (collectively, “the ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order vacating Special Master Order No. 84 (ECF No. 2476) and requiring third-party Valisure LLC (“Valisure”) to respond to the ZHP Defendants’ narrow Rule 45 subpoena seeking the production of plainly relevant information. This objection and motion to vacate Special Master Order No. 84 is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 53(f) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum of Law in Support of ZHP Defendants’ Objections to and Motion to Reverse Special Master Order No. 84, and the exhibit thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: September 19, 2023

Respectfully submitted,

By: /s/ Jessica Davidson
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U.S., Inc., Princeton Pharmaceutical
Inc., and Solco Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson
Jessica Davidson